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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
:
DITECH HOLDING CORPORATION, *et al.* : Case No. 19-10412 (JLG)
:
Debtors.¹ : (Jointly Administered)
:
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**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MAY 10, 2019 AT 11:00 A.M.**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, before the Honorable James L. Garrity, Jr., United States Bankruptcy Judge, One Bowling Green, Courtroom 601, New York, New York 10004

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). The Debtors' principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

I. MATTERS GOING FORWARD:

1. Motion of Debtors for Entry of an Order (I) Approving Disclosure Statement and Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Sale and Confirmation Hearing, (IV) Approving Sale and Confirmation Objection Procedures and Notice of Sale and Confirmation Hearing, (V) Approving Bidding Procedures, (VI) Approving Assumption and Assignment Procedures, and (VII) Granting Related Relief **[ECF No. 147]**

Response Deadline: April 4, 2019 at 4:00 p.m.

Resolved Responses:

- A. Objection of the Geary Class Action to Adequacy of the Amended Disclosure Statement **[ECF No. 336]**
- B. Objection of the Official Committee of Unsecured Creditors **[ECF No. 337]**
- C. Objection of the United States Trustee to Approval of the Disclosure Statement **[ECF No. 348]**

Responses to Disclosure Statement:

- D. Objection of Creditor Marsha Chambers to the Disclosure Statement and Plan **[ECF No. 264]**
- E. International Fidelity Insurance Company and Allegheny Casualty Company's Objection to Debtors' Motion to Approve Disclosure Statement and the Amended Disclosure Statement **[ECF No. 341]**
- F. Joinder of Richard Legans, *et al.* to Objection of the Official Committee of Unsecured Creditors **[ECF No. 352]**
- G. Joinder of Richard Legans, *et al.* to Objection of the Geary Class Action to Motion for Entry of an Order Approving the Amended Disclosure Statement **[ECF No. 353]**
- H. Joinder of Richard Legans, *et al.* to Objection of International Fidelity Insurance Company and Allegheny Casualty Company **[ECF No. 354]**
- I. Objection of Richard Legans, *et al.* to Amended Disclosure Statement **[ECF No. 355]**

Related Documents:

- J. Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors **[ECF No. 515]**

- K. Amended Disclosure Statement for Amended Joint Chapter 11 Plan **[ECF No. 516]**
- L. Revised Proposed Order Approving the Disclosure Statement and Solicitation and Voting Procedures **[ECF No. 517]**
- M. Debtors' Omnibus Reply to Objections to Debtors' Disclosure Statement and Solicitation and Voting Procedures **[ECF No. 424]**
- N. Statement of Term Loan Ad Hoc Group in Support of the Debtors' Omnibus Reply to Objections to Debtors' Disclosure Statement and Solicitation and Voting Procedures **[ECF No. 426]**
- O. Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors **[ECF No. 469]**
- P. Amended Disclosure Statement for Amended Joint Chapter 11 Plan **[ECF No. 470]**

Status: This matter is going forward with respect to the Debtors' request for Approval of the Disclosure Statement and Solicitation Procedures.

- 2. Debtors' Motion for Interim and Final Orders (A) Authorizing Debtors to Enter into Repurchase Agreement Facilities, Servicer Advance Facilities and Related Documents; (B) Authorizing Debtors to Sell Mortgage Loans and Servicer Advance Receivables in Ordinary Course of Business; (C) Granting Back-Up Liens and Superpriority Administrative Expense Claims; (D) Authorizing Use of Cash Collateral and Granting Adequate Protection; (E) Modifying the Automatic Stay; (F) Scheduling a Final Hearing; and (G) Granting Related Relief **[ECF No. 26]**

Response Deadline: March 19, 2019 at 4:00 p.m.

Resolved Responses:

- A. Protective Objection of Geary Class Action **[ECF No. 163]**
- B. Objection of Official Committee of Unsecured Creditors **[ECF No. 213]**

Response Filed:

- C. Objection of International Fidelity Insurance Company and Allegheny Casualty Company **[ECF No. 161]**

Related Documents:

- D. Notice of Filing of Proposed Final Order Authorizing Use of Cash Collateral, Granting Adequate Protection, and Granting Related Relief [ECF No. 530]
- E. Debtors' Omnibus Reply to Objections to Debtors' Entry into Debtor in Possession Financing and Use of Cash Collateral [ECF No. 344]
- F. Joinder of DIP Agent to Debtors' Omnibus Reply [ECF No. 345]
- G. Statement of Term Loan Ad Hoc Group in support of the Debtors' Omnibus Reply to Objections to Debtors' Entry into Debtor in Possession Financing and Use of Cash Collateral [ECF No. 346]
- H. Declaration of Jeffrey Lewis in Support of Debtors' Motion [ECF No. 27]
- I. Final DIP Order [ECF No. 422]

Status: This matter is going forward on an uncontested basis solely with respect to the Debtors' request for Authorization to Use Cash Collateral and Granting Adequate Protection. The Debtors will present to the Court the proposed *Final Order Authorizing Use of Cash Collateral, Granting Adequate Protection, and Granting Related Relief* (ECF No. 530) for approval.

Dated: May 9, 2019
New York, New York

/s/ Sunny Singh
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